

## REMARKS

This Amendment is in response to the Office Action mailed December 27, 2002. In the Office Action, the Examiner rejected claims 3-7, 10-15 and 18-24.

Claims 3, 5, 10, 12, 15 and 21-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,002,411 (hereinafter referred to as “the ‘411 patent”) in view of U.S. Patent No. 6,173,381 issued to Dye (hereinafter referred to as “the ‘381 patent”). Claims 4, 11, 18 and 23-24 were rejected under 35 U.S.C. §103(a) as being unpatentable over ‘411 patent in view of the ‘381 patent and U.S. Patent No. 5,574,836 issued to Broemmelsiek (hereinafter referred to as “the ‘836 patent”). Claims 6, 13 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over ‘411 patent in view of the ‘381 patent and U.S. Patent No. 5,733,246. Claims 7, 14 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over ‘411 patent in view of the ‘381 patent and U.S. Patent No. 5,748,178. Applicants respectfully traverse the multiple §103(a) rejections in their entirety.

### I. REJECTIONS UNDER 35 U.S.C. § 103(a) – CLAIMS 3, 5, 10, 12, 15 AND 21-22

Claims 3, 5, 10, 12, 15 and 21-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over the ‘411 patent in view of the ‘381 patent. Applicants respectfully disagree with the rejection because a prima facie case of obviousness has not been met. Neither the ‘411 patent nor the ‘381 patent, alone or in combination, describes or even suggests a display controller, operation or sub-program that sends *only marked memory pages to the image frame of the display* as set forth in claims 3, 12 and 15. (Emphasis added). A “marked memory page” corresponds to a region of an image frame that has been updated (modified)

In contrast, the ‘411 patent describes an integrated memory controller (IMC) that includes a Window Assembler 240 that assembles video refresh data on a per window basis using a pointer-based Display Refresh List. When an object or window is moved to a new

position on the video screen, the data comprising the object does not transfer to another location in system memory (110). Rather, only the display pointer address is changed in the Display Refresh List. *See col. 17, lines 37-45.* However, the pointer-based display refresh system does not function as to send *only* marked memory pages to the image frame of the display as claimed, but involves maintaining content within memory areas and merely adjusting pointers to these areas, which is no relationship to the claimed invention.

Hence, Applicants respectfully request withdrawal of the above-cited §103(a) rejection.

II. REJECTIONS UNDER 35 U.S.C. § 103(a) – CLAIMS 4, 6-7, 11, 13-14, 18-20 and 23-24

Claims 4, 6-7, 11, 13-14, 18-20 and 23-24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over the '411 patent in view of the '381 patent and another secondary reference. Applicants respectfully request that the above-identified claims are in condition for allowance not only by their dependency on allowable claims 3, 12 and 15 and that there is no motivation to combine the three references together. Applicants reserve the right to address each and every reason for such lack of motivation in an Appeal if deemed necessary.

In light of the foregoing, Applicants respectfully request withdrawal of the rejection.

VERSION WITH MARKINGS TO SHOW CHANGES MADE

No changes have been made to the claims.


CONCLUSION

In view of the amendments and remarks made above, it is respectfully submitted that all pending claims are in condition for allowance, and such action is respectfully solicited.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

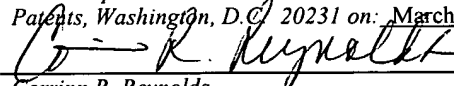
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CERTIFICATE OF MAILING

*I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on: March 12, 2003.*

  
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Corrin R. Reynolds  
Date 3/12/03